LAW OFFICES

GREENBLUM & BERNSTEIN, P.L.C.

NEIL F. GREENBLUM O PATENT, COPYRIGHT AND TRADEMARK MATTERS BRUCE H. BERNSTEIN O 1950 ROLAND CLARKE PLACE JAMES L. ROWLAND ARNOLD TURK A RESTON, VA 20191-1411 MICHAEL J. FINK TEL: (703) 716-1191 STEPHEN M. ROYLANCE \Diamond ROBERT W. MUELLER FAX: (703) 716-1180 WILLIAM E. LYDDANE WILLIAM S. BOSHNICK* EMAIL: gbpatent@gbpatent.com PAUL A. BRAIER, Ph.D. P. BRANKO PEJIC www.gbpatent.com DANIEL B. MOON

HARRY J. GWINNELL JEFFREY H. HANDELSMAN* KENNETH H. SALEN ◊ SOK K. HONG TAL KONDO I JEFFREY R. BOUSQUET ◊ GARY M. JACOBS JAMES A. GROMADA SHAWN A. HAMIDINIA, Ph.D. ALI M. IMAM * CHAD E. GORKA CHUONG T. NGUYEN * DANIELLE C. PFIFFERLING SAMUEL EBERT-ZAVOS

March 18, 2022

* ADMITTED TO A BAR OTHER THAN VA

REGISTERED PATENT AGENT

O FOUNDING COUNSEL

♦ OF COUNSEL Δ SENIOR COUNSEL

VIA ECF

BRUCE H. STONER, JR. ◊

BARRY I. HOLLANDER ◊

GARY V HARKCOM *◊

JAMES P. BONNAMY

JILL M. BROWNING

NAOKO OHASHI*

SEAN C. MYERS-PAYNE, Ph.D. JONATHAN R. MILLER STEVEN B. POLLICOFF *

WALTER SCHLAPKOHL, Ph.D.

ENOCH PEAVEY

Hon. Vernon S. Broderick **United States District Court** Southern District of New York Thurgood Marshall United States Courthouse 40 Foley Square, Room 415 New York, New York 10007

APPLICATION GRANTED SO ORDERED VERNON S. BRODERICK **U.S.D.J.** 03/18/22

Plaintiff is directed to Rule 5.B. of my Individual Rules & Practices in Civil Cases and to meet and confer with Defendants as necessary to determine if the written responses can be filed in redacted form on ECF.

Re: Spectrum Dynamics Medical Limited v. GE; Case No.: 18-cv-11386 (VSB) Re:

Dear Judge Broderick:

We represent Plaintiff Spectrum Dynamics Medical Limited ("Plaintiff" or "Spectrum") in the above-referenced action. On behalf of Plaintiff, we write pursuant to Rule 5.B. of your Honor's Individual Practices in Civil Cases to respectfully request permission to file under seal Plaintiff's written responses to the questions posed in Your Honor's March 9, 2022 Order (Doc. 417), and accompanying Appendices 1-6 filed today, March 18, 2022.

Plaintiff requests permission to file the written responses and Appendices 1-6 thereto under seal because the documents contain information designated as "Highly Confidential -Attorneys' Eyes Only" by the respective parties under the Stipulated Confidentiality and Protective Order (Doc. 156).

Respectfully submitted,

/Neil F. Greenblum/

Neil F. Greenblum

cc: All counsel of record (via ECF) {J734902 05200874.DOCX}